

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to: All Cases.

MASTER DOCKET

18-md-2865 (LAK)

**MOTION FOR ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL  
ASSISTANCE TO OBTAIN EVIDENCE IN THE UNITED KINGDOM**

PLEASE TAKE NOTICE that the undersigned attorneys for the plaintiff SKATTEFORVALTNINGEN (“SKAT”), the Customs and Tax Administration of the Kingdom of Denmark, will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of a Request for International Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, SKAT relies upon the accompanying Memorandum of Law and Declaration of Neil J. Oxford dated April 9, 2021 and the exhibits attached thereto.

Dated: New York, New York  
April 9, 2021

HUGHES HUBBARD & REED LLP

By: /s/ Neil J. Oxford

William R. Maguire  
Marc A. Weinstein  
Neil J. Oxford  
Dustin P. Smith  
One Battery Park Plaza  
New York, New York 10004-1482  
Telephone: (212) 837-6000  
Fax: (212) 422-4726  
[bill.maguire@hugheshubbard.com](mailto:bill.maguire@hugheshubbard.com)  
[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)  
[neil.oxford@hugheshubbard.com](mailto:neil.oxford@hugheshubbard.com)  
[dustin.smith@hugheshubbard.com](mailto:dustin.smith@hugheshubbard.com)

*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
Kingdom of Denmark)*